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February 5, 2020

APPLICATION GRANTED

SO ORDERED

VERNON S. BRODERICK

U.S.D.J. 2/6/2020

The post-discovery conference is adjourned to April 9, 2020, at 11:30 a.m. The parties are advised that absent exceptional circumstances, further extensions are unlikely to be granted.

VIA ECF ONLY

Honorable Magistrate Judge Vernon S. Broderick
United States District Court, Southern District of New York
40 Foley Square
New York, New York 10007

**RE: Velez v. Eagle Bending Machines, Inc., et al.
Docket No.: 17-cv-08900(VSB)**

Dear Judge Broderick:

The undersigned represents the Plaintiff in the above captioned matter. Please accept this correspondence as a request for an extension on discovery.

To date, expert discovery remains outstanding. While all discovery, inclusive of expert discovery, was due per Order by January 31, 2020, the undersigned is respectfully requesting that the Court enter an Order extending this deadline to **March 20, 2020**. This request is on consent of all parties. The undersigned apologizes this request is late. However, due to some internal matter, there was an oversight in filing this request. In addition, there were internal changes which unfortunately caused scheduling conflicts.

To the extent the Court requires the parties to file a Proposed Amended Scheduling Order which memorializes specific dates for Fact discovery, Expert Discovery and otherwise, the parties will comply. Additionally, the undersigned requests the Post-Discovery Conference on February 20, 2020 be adjourned to a date the most convenient for the Court after discovery closes.

Since this request is on consent and is not being made in bad faith, the undersigned believes the extension will benefit all parties and is very likely the final request that will be necessary.

Thank you for your time and consideration in this matter.

Respectfully Submitted,
/s/Joseph Dell
Joseph G. Dell (JD-7315)

JGD/ks

CC: Counsel of Record via ECF